

**Institute and Faculty of Actuaries**  
**Regulatory Board**  
**Noting report**

<b>Subject</b>	FRC consultation on draft revised TAS 100	
<b>Regulatory Board meeting</b>	5 July 2022	
<b>Previous Board Update/Steer/Approval</b>	21 June 2021	Response to FRC's Call for Evidence on TAS 100 circulated to the Board
	8 February 2022	Update to Board on FRC's publication of a position paper
<b>International Issues Considered</b>	UK specific matter	
<b>Author</b>	IFoA Executive	
<b>Purpose</b>	Noting	

**A: Executive summary**

1. This paper provides an update to the Regulatory Board ('the Board') on publication by the Financial Reporting Council (FRC) of a draft revised TAS 100.
2. This paper also sets out the proposed next steps in relation to these developments.

**B: Update**

3. Board members will recall that in early 2021, the FRC's Actuarial Policy Team issued a Call for Evidence (CFE) in relation to its Technical Actuarial Standard TAS 100.
4. By way of background, the TAS 100 is the FRC's 'General Actuarial Standard' applying to all IFoA members that are carrying out 'Technical Actuarial Work' within 'UK Geographic Scope' (both terms are defined by the FRC). This was introduced in late 2016. Previously the FRC had set specific TASs only for particular areas of work (largely focused on reserved work within insurance and pensions) and had some general TASs that also applied to any work within scope of the specific TASs. The FRC reviewed the TAS framework and decided to combine those general TASs and extend their scope to any IFoA members carrying out work within scope of their new definition of Technical Actuarial Work.
5. The IFoA also published (in January 2018), at the request of the FRC, Non-Mandatory Guidance on the TAS 100, which was developed by an IFoA Working Party following extensive engagement with members and with input from the FRC.
6. The IFoA's response to the CFE was provided by the Board, representing the IFoA as the body responsible for enforcing the TAS 100. A steer was also provided by the IFoA's Council Regulatory Strategy Steering Group (the Strategy Group) on the response, given its direct relevance to the wider discussions around the future arrangements for actuarial regulation in the UK.

7. A copy of the IFoA's response is included at **Appendix 1**. In it, the Board raised fundamental concerns about the TAS 100 and about the FRC having in place a generally applying standard of that nature. It suggested that the FRC should focus on specific TASs relating to identified areas of work and that the IFoA should be left to set any more general professional standards (ethical and technical) for its members. This aligned with the IFoA's response to the UK Government's proposals for actuarial regulation set out in its White Paper '[Restoring Trust in Audit and Corporate Governance](#)'.
8. The FRC did not provide any response to the IFoA and there was no specific mention of those concerns in the [Position Paper](#) that was published by the FRC in November 2021. The Board Chair raised this with the FRC's CEO in subsequent meetings, indicating unhappiness that there had not even been acknowledgement of concerns raised by the body responsible for enforcing the TAS 100.
9. The FRC have now (15 June) published the following documents for consultation:
  - a) [Draft of a revised TAS 100](#)
  - b) [Draft guidance on the definitions of Technical Actuarial work and UK Geographic Scope](#)
  - c) [Draft Guidance on applying proportionality](#)
10. The date for responding to the consultation is 7 September 2022.

#### **C: Initial observations**

11. [redacted]

#### **D: Next steps**

12. Further work will be carried out to analyse the FRC's proposals and a draft response will be circulated to the Board for consideration and approval. Given the deadline, this is likely to be by email, although a call can be arranged if Board members would prefer that.
13. Reflecting its relevance to the wider discussions around the future actuarial regulation, the draft response will also be shared with the Strategy Group for input, although it is proposed that it will be provided to the FRC by the Regulatory Board, given that the response will be from the IFoA in its co-regulator capacity.
14. It may be helpful to agree an early response to the consultation so that this can be published and Members are able to understand the IFoA's position before reflecting upon their own responses.

#### **E: Discussion**

15. Members of the Board are invited to note the update.

#### **Appendices:**

**Appendix 1:** IFoA response